

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	
UNITED STATES OF AMERICA	:	
	:	CONSENT PRELIMINARY ORDER
- v. -	:	OF FORFEITURE AS TO SPECIFIC
	:	PROPERTY/
PEACHES STERGO,	:	<u>MONEY JUDGMENT</u>
a/k/a "Alice,"	:	
	:	23 Cr. 020 (ER)
Defendant.	:	
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WHEREAS, on or about January 12, 2023, PEACHES STERGO, a/k/a "Alice" (the "Defendant"), was charged in an Indictment, 23 Cr. 020 (ER) (the "Indictment"), with wire fraud, in violation of Title 18, United States Code, Sections 1343 and 2 (Count One);

WHEREAS, the Indictment included a forfeiture allegation as to Count One of the Indictment, seeking forfeiture to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), of any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the offense charged in Count One of the Indictment, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of the offense charged in Count One of the Indictment and, *inter alia*, the following specific property:

- a. All motor vehicles purchased using funds from either TD Bank account no. 4326399098 or Wells Fargo Bank account no. 5185245528;
- b. A Rolex Oyster Perpetual Day-Date 40 with President Bracelet, serial number JF939262;
- c. A Rolex Datejust 41 with Jubilee Bracelet, serial number 28QQ4899;
- d. A Rolex Datejust 41 with Oyster Bracelet and Roman Numeral dial, serial number 32M48485;
- e. The following property purchased from APMEX: two 1 oz American Gold Eagle BUs purchased on or about September 9, 2021; two 1 oz American Gold Eagle BUs purchased on or about August 8, 2021; two 1 kg cast-poured silver

bars purchased on or about December 22, 2020; one 10 oz silver bar purchased on or about December 22, 2020; two 1 oz platinum bars, PAMP Suisse, purchased on or about December 22, 2020; one .5 oz gold bar, PAMP Suisse Lady Fortuna Veriscan, purchased on or about October 28, 2020; one 10 oz silver bar, APMEX, purchased on or about October 28, 2020; one 1 oz gold bar, Credit Suisse, purchased on or about October 28, 2020; two .25 oz. 2020 Gold American Eagle BUs purchased on or about April 28, 2020; and two .5 oz Gold American Eagle BUs purchased on or about April 9, 2020; and

- f. All property purchased from R&R Design Jewelry, Jawahir Jewelry, Hermes, Louis Vuitton, Nordstroms, Disney, Target, Saks, Neiman Marcus, Amazon, Ralph Lauren, Lowes, Apple, Tory Burch, Wal-Mart, Tommy Bahama, Tiffany, Polo, and Yves Saint Laurent using funds from either TD Bank account no. 4326399098 or Wells Fargo Bank account no. 5185245528;

(a. through f., collectively, the "Indictment Property");

WHEREAS, on or about April 6, 2023, the Government filed a Government's Forfeiture Bill of Particulars identifying property subject to forfeiture as a result of the offense charged in Count One of the Indictment and as alleged in the forfeiture allegations and or substitute asset provisions therein, to include the following:

- a. Any and all property the Government seized on or about January 25, 2023, pursuant to a judicially authorized warrant, from the Defendant's residence in Champion's Gate, Florida, including the property listed in Exhibit A, attached hereto ("Seized Property-1"); and
- b. Any and all property the Government seized on or about March 20, 2023, pursuant to a judicially authorized warrant, from Bank of America, N.A. safe deposit box no. 000402011459, located at 4501 W. Lake Mary Blvd, Lake Mary, FL 32746, including the property listed in Exhibit A, attached hereto ("Seized Property-2");

WHEREAS, on or about April 14, 2023, the Defendant pled guilty to Count One of the Indictment, pursuant to a plea agreement with the Government, wherein the Defendant admitted the forfeiture allegation with respect to Count One of the Indictment and agreed to forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c): (i) a sum of money equal to \$2,830,775 in United States

currency, representing proceeds traceable to the commission of the offense charged in Count One of the Indictment; and (ii) all right, title and interest of the Defendant in the Indictment Property, Seized Property-1, and Seized Property-2 (collectively, the “Specific Property”);

WHEREAS, the Defendant consents to the entry of a money judgment in the amount of \$2,830,775 in United States currency, representing the amount of proceeds traceable to the offense charged in Count One of the Indictment that the Defendant personally obtained;

WHEREAS, the Defendant further consents to the forfeiture of all her right, title and interest in the Specific Property, which constitutes or is derived from the proceeds traceable to the offense charged in Count One of the Indictment that the Defendant personally obtained;

WHEREAS, the Defendant admits that, as a result of acts and/or omissions of the Defendant, the proceeds traceable to the offense charged in Count One of the Indictment that the Defendant personally obtained cannot be located upon the exercise of due diligence, with the exception of the Specific Property; and

WHEREAS, pursuant to Title 21, United States Code, Section 853(g), and Rules 32.2(b)(3), and 32.2(b)(6) of the Federal Rules of Criminal Procedure, the Government is now entitled, pending any assertion of third-party claims, to reduce the Specific Property to its possession and to notify any and all persons who reasonably appear to be a potential claimant of their interest herein;

IT IS HEREBY STIPULATED AND AGREED, by and between the United States of America, by its attorney Damian Williams, United States Attorney, Assistant United States Attorney Adam Sowlati, of counsel, and the Defendant and her counsel, Ann Fitz, Esq., that:

1. As a result of the offense charged in Count One of the Indictment, to which the Defendant pled guilty, a money judgment in the amount of \$2,830,775 in United States

currency (the “Money Judgment”), representing the amount of proceeds traceable to the offense charged in Count One of the Indictment that the Defendant personally obtained, shall be entered against the Defendant.

2. As a result of the offense charged in Count One of the Indictment, to which the Defendant pled guilty, all of the Defendant’s right, title and interest in the Specific Property is hereby forfeited to the United States for disposition in accordance with the law, subject to the provisions of Title 21, United States Code, Section 853.

3. Pursuant to Rule 32.2(b)(4) of the Federal Rules of Criminal Procedure, this Consent Preliminary Order of Forfeiture as to Specific Property/Money Judgment is final as to the Defendant PEACHES STERGO, and shall be deemed part of the sentence of the Defendant, and shall be included in the judgment of conviction therewith.

4. All payments on the outstanding Money Judgment shall be made by postal money order, bank or certified check, made payable to the United States Marshals Service, and delivered by mail to the United States Attorney’s Office, Southern District of New York, Attn: Money Laundering and Transnational Criminal Enterprises Unit, One St. Andrew’s Plaza, New York, New York 10007 and shall indicate the Defendant’s name and case number.

5. The United States Marshals Service is authorized to deposit the payments on the Money Judgment into the Assets Forfeiture Fund, and the United States shall have clear title to such forfeited property.

6. Upon entry of this Consent Preliminary Order of Forfeiture as to Specific Property/Money Judgment, the United States (or its designee) is hereby authorized to take possession of the Specific Property and to hold such property in its secure custody and control.

7. Pursuant to Title 21, United States Code, Section 853(n)(1), Rule 32.2(b)(6) of the Federal Rules of Criminal Procedure, and Rules G(4)(a)(iv)(C) and G(5)(a)(ii) of the Supplemental Rules for Certain Admiralty and Maritime Claims and Asset Forfeiture Actions, the United States is permitted to publish forfeiture notices on the government internet site, www.forfeiture.gov. This site incorporates the forfeiture notices that have been traditionally published in newspapers. The United States forthwith shall publish the internet ad for at least thirty (30) consecutive days. Any person, other than the Defendant, claiming interest in the Specific Property must file a Petition within sixty (60) days from the first day of publication of the Notice on this official government internet web site, or no later than thirty-five (35) days from the mailing of actual notice, whichever is earlier.

8. The published notice of forfeiture shall state that the petition (i) shall be for a hearing to adjudicate the validity of the petitioner's alleged interest in the Specific Property, (ii) shall be signed by the petitioner under penalty of perjury, and (iii) shall set forth the nature and extent of the petitioner's right, title or interest in the Specific Property, the time and circumstances of the petitioner's acquisition of the right, title and interest in the Specific Property, any additional facts supporting the petitioner's claim, and the relief sought, pursuant to Title 21, United States Code, Section 853(n).

9. Pursuant to 32.2 (b)(6)(A) of the Federal Rules of Criminal Procedure, the Government shall send notice to any person who reasonably appears to be a potential claimant with standing to contest the forfeiture in the ancillary proceeding.

10. Upon adjudication of all third-party interests, this Court will enter a Final Order of Forfeiture with respect to the Specific Property pursuant to Title 21, United States Code, Section 853(n), in which all interests will be addressed. All Specific Property forfeited to the

United States under a Final Order of Forfeiture shall be applied towards the satisfaction of the Money Judgment.

11. Pursuant to Title 21, United States Code, Section 853(p), the United States is authorized to seek forfeiture of substitute assets of the Defendant up to the uncollected amount of the Money Judgment.

12. Pursuant to Rule 32.2(b)(3) of the Federal Rules of Criminal Procedure, the United States Attorney's Office is authorized to conduct any discovery needed to identify, locate or dispose of forfeitable property, including depositions, interrogatories, requests for production of documents and the issuance of subpoenas.


13. The Court shall retain jurisdiction to enforce this Consent Preliminary Order of Forfeiture as to Specific Property/Money Judgment, and to amend it as necessary, pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure.

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14. The signature page of this Consent Preliminary Order of Forfeiture as to Specific Property/Money Judgment may be executed in one or more counterparts, each of which will be deemed an original but all of which together will constitute one and the same instrument.

AGREED AND CONSENTED TO:

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

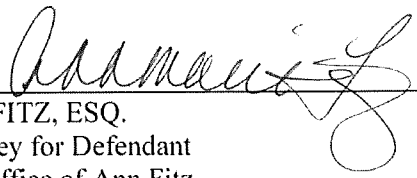
By: 
ADAM SOWLATI
Assistant United States Attorney
One St. Andrew's Plaza
New York, NY 10007
(212) 637-2438

April 10, 2023
DATE

PEACHES STERGO

By: 
PEACHES STERGO

4/11/23
DATE

By: 
ANN FITZ, ESQ.
Attorney for Defendant
Law Office of Ann Fitz
500 S. Australian Ave, Ste, 542
West Palm Beach, FL 33401

4/12/2023
DATE

SO ORDERED:


HONORABLE EDGARDO RAMOS
UNITED STATES DISTRICT JUDGE

4/14/2023
DATE

EXHIBIT A

a. Any and all property the Government seized on or about January 25, 2023, pursuant to a judicially authorized warrant, from the Defendant's residence in Champion's Gate, Florida, includes the following property;

- i. One silver Rolex Geneva with green Rolex box;
- ii. One silver Rolex;
- iii. One light blue iPhone in clear case;
- iv. One Bank of America bag containing gold coins;
- v. One mirror box containing six (6) Rolex watches, a gold coin, an assortment of jewelry, and tools for Rolex;
- vi. One Rolex box containing gold-colored Rolex;
- vii. One Louis Vuitton "Keepall 55 Bandouliere Travel Bag" brown print and red accent leather duffle bag, with gold colored hardware;
- viii. One pink iPad in pink case with cover and charger;
- ix. \$9,300 in United States currency, consisting of ninety-three (93) hundred-dollar bills in a SunTrust bag;
- x. One gold and diamond turtle;
- xi. One Cartier red leather handbag with miscellaneous documents;
- xii. \$100 in United States currency, consisting of one (1) hundred-dollar bill;
- xiii. \$4,503 in United States currency, consisting of forty-five (45) hundred-dollar bills and three (3) singles;
- xiv. Coco de Chanel and Tiffany earrings in bag;
- xv. One Louis Vuitton "Zippy" brown print leather wallet, with gold colored hardware;
- xvi. One Louis Vuitton bag, containing bag, containing box with LV scarf and bag with LV cuff links;
- xvii. One Christian Louboutin white canvas tote bag with red leather handles and silver colored emblems;
- xviii. One Christian Louboutin white leather handbag with red accents and silver colored emblems;
- xix. One Christian Louboutin navy blue leather clutch with red accent and silver colored hardware;
- xx. One Christian Louboutin nude patent leather clutch with red accent and silver colored hardware;
- xxi. One Christian Louboutin nude leather clutch with red accent and silver colored hardware;
- xxii. One Valentino Garavani nude leather clutch with gold colored studding;

- xxiii. One Louis Vuitton dark brown crossbody purse with gold colored chain and hardware;
- xxiv. One Saint Laurent nude leather handbag with silver colored hardware;
- xxv. One Saint Laurent blue leather clutch with gold colored logo emblem;
- xxvi. One Chanel grey quilted leather handbag with silver colored hardware, with Card of Authenticity (SN 29225021);
- xxvii. One Christian Dior pink quilted patent leather crossbody purse, with silver colored hardware;
- xxviii. One Louis Vuitton cream and grey leather pattern handbag with light brown leather handles, with gold colored hardware;
- xxix. One Louis Vuitton brown pattern handbag with dark brown leather handles, with gold colored hardware;
- xxx. One Christian Louboutin navy blue leather tote bag, with red accent and silver colored studding;
- xxxi. One Prada grey handbag, with gold colored hardware;
- xxxii. One Gucci red leather quilted zippered wallet, with gold colored hardware (found inside Prada grey handbag and containing miscellaneous items);
- xxxiii. One Louis Vuitton brown pattern tote bag with red leather handles, with gold colored hardware and \$.35 found inside;
- xxxiv. One Louis Vuitton brown pattern handbag with light brown leather handles, with gold colored hardware and, with keys for lock with a religious pin attached through "lock" hole;
- xxxv. One pair of men's Louis Vuitton white/grey leather loafer shoes, made in Italy (Marking: ND 1107);
- xxxvi. One pair of men's Louis Vuitton Brown leather loafer shoes, made in Italy (Marking: ND 0139);
- xxxvii. One pair of men's Gucci black leather loafer shoes with silver colored buckle, made in Italy (Marking: 450892 04Z);
- xxxviii. One pair of men's Salvatore Ferragamo black leather loafer shoes with silver colored buckle, made in Florence, Italy (Marking: YQ 10363);
- xxxix. One pair of men's Salvatore Ferragamo brown leather loafer shoes with gold colored buckle, made in Florence, Italy (Marking: YQ 9111);
- xl. One pair of men's Salvatore Ferragamo blue leather loafer shoes with silver colored buckle, made in Florence, Italy (Marking: 91VF 89733);
- xli. One pair of men's Salvatore Ferragamo grey suede loafer shoes with silver colored buckle, made in Florence, Italy (Marking: ZM071105 EE);
- xlii. One pair of men's Salvatore Ferragamo black suede loafer shoes with gold colored buckle, made in Florence, Italy (Marking: 0033105);
- xliii. One pair of men's Louis Vuitton black leather lace up dress shoes, made in

- Italy (Marking: ST0176);
- xliv. One pair of men's Louis Vuitton Brown leather lace up dress shoes, made in Italy (Marking: 01 1109);
 - xliv. One Stefano Ricci black 100% silk men's tie, with sparkle honeycomb accent, made in Italy;
 - xlvi. One Gucci grey 100% silk men's tie, 148 x 8 cm, made in Italy;
 - xlvi. One Gucci blue 100% silk men's tie, 148 x 7 cm, made in Italy (Article number: 408865 4E002);
 - xlvi. One Gucci red 100% silk men's tie, 148 x 8 cm, made in Italy;
 - xlvi. One Gucci brown 100% silk men's tie, 148 x 8 cm, made in Italy;
 - l. One Hermes orange 100% silk men's tie, made in France;
 - li. One Hermes pink 100% silk men's tie, made in France;
 - lii. One Louis Vuitton black 100% silk men's tie, made in Italy;
 - liii. One Louis Vuitton blue 100% silk men's tie, made in Italy;
 - liv. One pair of women's Burberry black/archive beige rubber boot with vintage check upper (ID number: 8034299 1005);
 - lv. One pair of women's Christian Louboutin blue suede stiletto heels, made in Paris;
 - lvi. One pair of women's Christian Louboutin black suede stiletto booties, made in Paris, with protective storage bag;
 - lvii. One pair of Dolce and Gabbana black and white cloth textured with leather black tip sling black stiletto heels, made in Italy;
 - lviii. One pair of women's Christian Louboutin black leather block heels with clear accent, made in Italy (Marking: RF41679 85);
 - lix. One pair of women's Valentino Garavani brown leather with gold colored stud heels, with protective storage bag;
 - lx. One pair of women's Christian Dior cream patent leather sling back heel with "J'ADIOR" written on strap, made in Italy (Marking: MD 0718);
 - lxi. One pair of women's Tory Burch black leather upper with textile and leather lining boots with gold colored buckle logo emblem, made in China (Article Number 5595 D17);
 - lxii. One pair of women's Tory Burch black espadrille slide sandals with leather upper, made in China (Article Number 6772 K19);
 - lxiii. One pair of women's Gucci cream leather sandals with gold colored logo emblem, made in Italy (Marking: "L'AVEUGLE PAR AMOUR" on soles of shoes);
 - lxiv. One Christian Louboutin Nude Leather tote bag, with red accent and silver colored studding and \$0.10 found inside;
 - lxv. One Gucci cream leather handbag, with white leather tassel, with gold

- colored hardware;
- lxvi. One pair of men's Salvatore Ferragamo blue suede loafer shoes with silver colored and wood grained buckle, made in Florence, Italy (Marking: ZM073245 EE);
 - lxvii. One pair of men's Salvatore Ferragamo night green suede loafer shoes with black colored buckle, made in Florence, Italy, with price tag inside (Markings: 30VF96515, 0956 016, 8054721232693, 0074, and 0558841);
 - lxviii. One pair of men's Louis Vuitton black leather loafer shoes with black logo emblem buckle, made in Italy (Marking: FA0176);
 - lxix. One pair of men's Louis Vuitton navy blue leather loafers shoes with silver colored logo emblem buckle, made in Italy (Marking: ND0197);
 - lxx. One pair of men's Prada black leather loafer shoes with silver colored logo emblem, made in Italy (Marking: 2DD158);
 - lxxi. One pair of men's Gucci brown leather loafer shoes, made in Italy (Marking: 466904 045);
 - lxxii. One pair of men's Coach tan suede Chelsea boots with wooden sole, made in China (Markings: G1870 and L16/106);
 - lxxiii. One Gucci red leather crossbody purse, with red leather tassel, with gold colored hardware;
 - lxxiv. One one-ounce gold coin on a chain;
 - lxxv. One Louis Vuitton brown pattern purse with two-toned brown leather strap, with gold colored hardware;
 - lxxvi. One Louis Vuitton brown pattern tote bag with light brown leather handle, with gold colored hardware and logo emblem, and \$.05 found inside;
 - lxxvii. \$110 in United States currency, consisting of one (1) hundred dollar bill, one (1) five dollar bill, and five (5) singles;
 - lxxviii. One pair of women's WALK'N DIOR grey stone with cloth texture Christian Dior lace up sneakers with "CHRISTIAN DIOR" written on laces, made in Italy (Markings: 108537/3429, KCK211OBES33G and DC 0120 39);
 - lxxix. One pair of women's Christian Dior black macrame embroidery lace sling back heel with "J'ADIOR" written on strap, made in Italy (Marking: NE 04 22, 1139038/2123 and KCP945MCM), with protective storage bag;
 - lxxx. One pair of women's Tom Ford gold colored sandals with brass and steel lock and key shaped ornaments, made in Italy (Markings: W1266T NLA, RN 134946, CA 00985), with four (4) extra heel tip caps replacements;
 - lxxxi. One pair of women's Giuseppe Zanotti "KANDA S, BASIC 85" black suede sling back heel with silver colored floral emblem, made in Italy (Marking: E00513), with protective storage bag;

- lxxxii. One pair of women's Louis Vuitton nude leather heel with gold colored logo emblem, made in Italy, with protective storage bag;
- lxxxiii. One pair of women's Manolo Blahnik "CHAOSBOW" nude suede heel, handmade in Italy (Markings: 105 590, 79228 2 and 340601 506049370) with protective storage bag;
- lxxxiv. One pair of women's Jimmy Choo "PANDORA" navy blue denim and cork wedge heel with gold colored log emblem, made in Spain, with protective storage bag;
- lxxxv. One pair of women's Jimmy Choo "ABEL" powder pink patent leather stiletto heel, made in Italy (Markings: J00011584439 and 090871);
- lxxxvi. One pair of women's Valentino Garavani black leather stiletto heel with gold colored studding, made in Italy (Marking: NW2S0D56CCS), with two (2) gold colored replacement studs;
- lxxxvii. One pair of women's Valentino Garavani "Rockstud Ankle Strap Sandals" black suede heel with bow, made in Italy (Marking: NW2S0A27V0D), with protective storage bag;
- lxxxviii. One pair of women's Channel "REV" tan lambskin and black leather Espadrilles, made in Spain (Markings: G29762X01000);
- lxxxix. One pair of women's Chanel black leather stiletto heels with pearl heel accents and black cloth toe accent, made in Italy (Marking: P G36673), with protective storage bag:
 - xc. One pair of women's Saint Laurent "CACHEMIRE MISIA" nude suede stiletto heels, made in Italy, (Marking: 471988 0LI00 2736), with two (2) extra heel tip caps replacements;
 - xci. One pair of women's Aquazzura "FOREVER MARILYN 105" black suede stiletto heels with tassel, made in Italy (Markings: FOMHIGP0-SUE-000);
 - xcii. One pair women's Gucci black suede stiletto heels with silver colored logo emblem, with two (2) extra heel tip caps replacements, made in Italy (Marking: 551214 C2000 1000), with two (2) protective storage bags;
 - xciii. One pair of women's Gucci white, green and red leather Miro sneakers, made in Italy, (Markings: 387993 90R), with two (2) protective storage bags;
 - xciv. One pair of women's Gucci white, green and red cloth Espadrilles, made in Spain, (Marking: 525728 100 "L'AVEUGLE PAR AMOUR" on soles of shoes), with two (2) protective storage bags;
 - xcv. One pair of women's Gucci cream cloth Espadrille loafers, made in Spain, (Marking: 466902 100);
 - xcvi. One pair of women's Gucci black leather open-toe heel sandals, made in Italy (Marking: 593389 07B), with two (2) protective storage bags;

- xcvii. One pair of women's Christian Louboutin black patent leather stiletto heels, made in Italy, with two (2) extra brown heel tip caps replacements, with a protective storage bag;
- xcviii. One pair of women's Christian Louboutin yellow patent leather stiletto heels, made in Italy, with a protective storage bag;
- xcix. One pair of women's Christian Louboutin pink patent leather stiletto heels, made in Italy;
 - c. One pair of women's Christian Louboutin nude patent leather heels, made in Italy, with a protective storage bag;
 - ci. One pair of women's Christian Louboutin nude and black patent leather stiletto heels, made in Italy, with two (2) extra heel tip caps replacements, with a protective storage bag;
 - cii. One pair of women's Christian Louboutin white and snake print patent leather stiletto heels, made in Italy, with two (2) extra heel tip caps replacements, with a protective storage bag;
 - ciii. One pair of women's Christian Louboutin white leather stiletto heels, made in Italy, with two (2) extra heel tip caps replacements, with a protective storage bag;
 - civ. One pair of women's Christian Louboutin gold crystal embellished stiletto heels, made in Italy, with a protective storage bag;
 - cv. One pair of women's Christian Louboutin red suede stiletto heels, made in Italy, with two (2) extra heel tip caps replacements;
 - cvi. One pair of women's Christian Louboutin black suede stiletto heels, made in Italy, with a protective storage bag;
 - cvii. One pair of women's Christian Louboutin "KATE" grey suede stiletto heels, made in Italy, with two (2) extra heel tip caps replacements, with a protective storage bag, with miscellaneous paperwork and card;
 - cviii. One pair of women's Christian Louboutin black lace stiletto heels, made in Italy, with two (2) extra red heel tip caps replacements;
 - cix. One pair of women's Christian Louboutin blue denim sandal block heels with silver colored buttons, made in Spain;
 - cx. One pair of women's Christian Louboutin black leather booties, made in Italy, with two (2) extra heel tip caps replacements;
 - cxi. One pair of diamond earrings; and
 - cxii. Gold Cartier bracelets.

(ai. through cxv., collectively, "Seized Property-1");

b. Any and all property the Government seized on or about March 20, 2023, pursuant to a judicially authorized warrant, from Bank of America, N.A. safe deposit box no. 000402011459, located at 4501 W. Lake Mary Blvd, Lake Mary, FL 32746, including the following property:

- i. Two (2) Suisse 1 ounce Platinum 999.5 (S/N #C046170, S/N #C046172;
- ii. Two (2) APMEX 10 Troy ounces .999 Fine Silver bars; and
- iii. Two (2) APMEX 1 kilogram .999 Fine Silver bars.

(bi. through iii., collectively, "Seized Property-2").